

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

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BARCO, INC. and BARCO NV,	)	
	)	
Plaintiffs,	)	
	)	Case No. 2:23-CV-00521-JRG-RSP
v.	)	JURY TRIAL DEMANDED
	)	
YEALINK (USA) NETWORK	)	
TECHNOLOGY CO., LTD., and	)	
YEALINK NETWORK	)	
TECHNOLOGY CO., LTD.	)	
	)	
Defendants.	)	
	)	

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**DECLARATION OF ERIK J. HALVERSON IN SUPPORT OF  
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT OF NO INVALIDITY**

I, Erik J. Halverson, hereby declare as follows:

1. I am a partner at the law firm of K&L Gates LLP and counsel for Plaintiffs Barco, Inc. and Barco NV (collectively, "Plaintiffs"). I have personal knowledge of the facts set forth in this Declaration and if called upon as a witness, I could and would testify to such facts under oath.
2. Attached as **Exhibit A** is a true and correct copy of Defendants' P.R. 3-3 and 3-4 Initial Invalidity Contentions.
3. Attached as **Exhibit B** is a true and correct copy of Defendants' Initial Eligibility Contentions and accompanying Exhibit 1 thereto (Claim Chart for U.S. Patent No. 11,258,676).
4. Attached as **Exhibit C** is a true and correct copy of the Expert Report of Richard F. Bero, CPA, CVA, dated May 15, 2025.

5. Attached as **Exhibit D** is a true and correct copy of the Expert Report of Kevin C. Almeroth, Ph.D., dated May 15, 2025.

6. Attached as **Exhibit E** is a true and correct copy of the Objections and Responses to Plaintiffs' Amended Notice of Rule 30(b)(6) Deposition Directed to Defendants Yealink Network Technology Co., Ltd. and Yealink (USA) Network Technology Co., Ltd., dated March 25, 2025.

7. Attached as **Exhibit F** are true and correct excerpts from the April 14, 2025 deposition of Yan Wang.

8. Attached as **Exhibit G** is a true and correct copy of U.S. Patent No. 11,258,676 to Beel et al.

9. Attached as **Exhibit H** are true and correct excerpts from the May 23, 2025 deposition of Kevin C. Almeroth, Ph.D.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 17, 2025 in San Francisco, CA.

/s/ Erik J. Halverson  
Erik J. Halverson